

1 LAWRENCE J. SEMENZA, III, Esq., Bar No. 7174
2 Email: ljs@skrlawyers.com
3 CHRISTOPHER D. KIRCHER, Esq., Bar No. 11176
4 Email: cdk@skrlawyers.com
5 JARROD L. RICKARD, Esq., Bar No. 10203
6 Email: jlr@skrlawyers.com
7 SEMENZA KIRCHER RICKARD
8 10161 Park Run Drive, Suite 150
9 Las Vegas, Nevada 89145
10 Telephone: (702) 835-6803
11 Facsimile: (702) 920-8669

12 *Attorneys for Charles M. Hallinan
13 and Hallinan Capital Corp.*

14 **UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA**

16 THOMAS W. McNAMARA, as the Court-
17 Appointed Monitor for AMG Capital
18 Management, LLC; BA Services LLC; Black
19 Creek Capital Corporation; Broadmoor Capital
20 Partners, LLC; Park 269, LLC; C5 Capital
21 LLC; DF Services Corp.; DFTW Consolidated
22 [UC] LLC; Impact BP LLC; Level 5 Apparel
23 LLC; Level 5 Capital Partners LLC; Level 5
24 Eyewear LLC; Level 5 Motorsports, LLC;
25 Level 5 Scientific LLC; NM Service Corp.
26 (f/k/a National Money Service); PSB Services
27 LLC; Real Estate Capital LLC (f/k/a Rehab
28 Capital I, LLC); Sentient Technologies; ST
Capital LLC; Westfund LLC; Eclipse
Renewables Holdings LLC; Scott Tucker
Declaration of Trust, dated February 20, 2015;
West Race Cars, LLC; and Level 5
Management LLC; and their successors,
assigns, affiliates, and subsidiaries,

Case No. 2:17-cv-02966-KJD-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY TO
MONITOR'S RESPONSE TO MOTION
TO DISMISS PLAINTIFF'S
COMPLAINT OR, IN THE
ALTERNATIVE, STAY THE
PROCEEDINGS**

(FIRST REQUEST)

Plaintiff,

v.

CHARLES M. HALLINAN, an individual;
HALLINAN CAPITAL CORP., a Delaware
corporation; DOES I-X; and ROE
CORPORATIONS I-X,

Defendants.

SEmenza Kircher Rickard
10161 Park Run Dr., Ste. 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

1 Plaintiff, Court-Appointed Monitor Thomas W. McNamara ("Plaintiff"), by and through
2 his counsel, Michael F. Lynch of the Lynch Law Practice, PLLC and Edward Chang and Logan
3 Smith of McNamara Smith LLP and Defendants Charles M. Hallinan and Hallinan Capital Corp.
4 ("Defendants"), by and through their counsel, Jarrod L. Rickard of Semenza Kircher Rickard,
5 hereby stipulate to the following:

6 WHEREAS, Defendants' Motion to Dismiss Plaintiff's Complaint or, in the Alternative,
7 Stay the Proceedings (the "Motion to Dismiss") was filed on January 29, 2018 (ECF No. 17);

8 WHEREAS, Plaintiff filed its Response to the Motion to Dismiss on March 12, 2018
9 (ECF No. 20);

10 WHEREAS, Defendants' deadline to file its reply to Plaintiff's Response to the Motion to
11 Dismiss is currently March 19, 2018; and

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

SEMENTZA KIRCHER RICKARD
10161 Park Run Dr., Ste. 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

1 WHEREAS, the parties stipulate, subject to Court approval, that Defendants' deadline to
2 file its reply to the Motion to Dismiss shall be extended by 1 week, to March 26, 2018.

3 Dated this 16th day of March 2018.

4 SEMENZA KIRCHER RICKARD

5 /s/Jarrod L Rickard

6 Jarrod L. Rickard, Esq.
7 Nevada Bar No. 10203
8 10161 Park Run Drive, Suite 150
Las Vegas, NV 89145

9 *Attorneys for Charles M. Hallinan
10 and Hallinan Capital Corp.*

Dated this 16th day of March 2018.

LYNCH LAW PRACTICE, PLLC

5 /s/ Michael F. Lynch

6 Michael F. Lynch (NV 8555)
3613 S. Eastern Ave.
7 Las Vegas, Nevada 89169

8 Logan Smith (*Admitted Pro Hac Vice*)
9 Edward Chang (NV 11783)
10 MCNAMARA SMITH LLP
11 655 West Broadway, Suite 1600
12 San Diego, California 92101

13 *Attorneys for Thomas W. McNamara, in his
14 capacity as Court-Appointed Monitor*

15 **IT IS SO ORDERED.**

16 _____
17 UNITED STATES DISTRICT COURT JUDGE

18 Dated:

19
20
21
22
23
24
25
26
27
28

SEmenza Kircher Rickard
10161 Park Run Dr., Ste. 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803